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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No.:4:22-MD-03047-YGR
MDL No. 3047

This Document Relates to:

Kathryn Guillot, Individually and on behalf of the Estate of Kennedy Loftin

SUPPORTING ALLEGATIONS RE:
DEFENDANT META'S OCULUS
PRODUCT AND DEFENDANTS
ROBLOX AND DISCORD

A. Additional Defendants

1. Defendant Roblox Corporation (“Roblox”) is a Delaware corporation. Its principal place of business is in San Mateo, CA.

2. Roblox owns, operates, controls, produces, designs, maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes the app Roblox. Roblox is widely available to consumers throughout the United States.

3. Defendant Discord Inc. (“Discord”) is a Delaware corporation. Its principal place of business is in San Francisco, CA.

SUPPORTING ALLEGATIONS RE:
DEFENDANT META'S OCULUS PRODUCT AND
DEFENDANTS ROBLOX AND DISCORD - 1

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1 4. Discord owns, operates, controls, produces, designs, maintains, manages, develops,
2 tests, labels, markets, advertises, promotes, supplies, and distributes the app Discord. Discord is
3 widely available to consumers throughout the United States.

4 **B. Additional Allegations Relating to Roblox and its Roblox Product**

5 5. Roblox owns, promotes, distributes and operates Roblox. Roblox was launched in
6 2006 and is a product described by Roblox as “a human co-experience platform.”

7 6. The Roblox product includes features that allow users to “interact with each other
8 to explore and develop immersive, user generated, 3D experiences”, including “experiences” that
9 take the form of games created by users (anything from a simulation of running a virtual restaurant
to adopting a pet).

10 7. The Roblox product is marketed to and designed to appeal to children, primarily
11 children under the age of 13. For example, the overall look and feel of Roblox—described as
12 “roughly hewn, blocky aesthetics and ugly text”—is “off-putting to adults.”¹ But the style of
13 Roblox and its “game” features are appealing to young children. Indeed, “children loved the fact
14 Roblox offered access to an endless stream of new and free experiences—a kind of YouTube for
video games.”²

15 8. Roblox is one of the most popular online products among American teens and
16 children. “A December 2017 study by Comscore reported that kids between the ages of 5 and 9
17 spend more time using the Roblox product than doing anything else online on PCs. For those
18 between the ages of 9 and 18, only YouTube consumes more of their online attention.³ As of 2020,
about 75% of American children ages 9 through 12” regularly uses Roblox, according to the

19 ¹ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
20 available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour> (“Roblox was built as a playful method of teaching children the rudiments of game-making”).

21 ² Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour> (“Roblox was built as a playful method of teaching children the rudiments of game-making”).

22 ³ See, e.g., Burt Helm, *Sex, lies, and video games: Inside Roblox’s war on porn*, Fast Company, Aug. 19, 2020,
available at <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>;
<https://www.businessofapps.com/data/roblox-statistics/> (“Roblox highest demographic is children under 13 and it was
the most popular entertainment app for that age group”).

1 company.⁴ During the pandemic, kids' use of Roblox escalated. Indeed, by July 2020, users spent
2 3 billion hours on Roblox, twice as much time as in February 2020."⁵

3 9. Roblox also marketed its product as educational and encouraged integration of its
4 product into several kid-focused organizations and activities. For example, "Schools, camps, Girl
5 Scout troops and many other organizations use Roblox to teach kids coding. And it has become a
quasi-social-network for children."⁶

6 10. Roblox generates the bulk of its revenue by selling its users in-game currency,
7 called "Robux," which users can then spend on virtual items for their avatars.⁷ Roblox reports that
8 only a small portion of users purchase Robux. On information and belief, a substantial number of
9 such users are adults, some of whom use Robux to entice and exploit child users.

10 11. Because Robux sales are key to the product's revenue, Roblox is disincentivized to
12 alter the product design and operation to prevent dangerous, exploitative and injurious adult-child
13 interactions using the Roblox product. Indeed, Roblox reported in its recent Form 10-Q that it
14 relies on developers to develop product offerings that encourage use of the Robux feature.⁸

15 12. Kennedy Loftin was under 13 when she began using the Roblox product and
16 Plaintiff Katheryn Guillot (like millions of other parents) was led by Roblox to understand that
17 Roblox was a children's product that was safe and appropriate for children under 13, like Kennedy,
18 to use.

19 13. For example, Roblox represents that it uses advanced technologies to, "identify
20 problematic language, potential bypasses to our chat filters, and content that falls outside our
21 policies" and "review and monitor communications that flow through Roblox to block and protect

22 20 ⁴ Shannon Liao, *How Roblox became the 'it' game for tweens—and a massive business*, CNN Business, Oct. 29,
2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>

23 21 ⁵ Shannon Liao, *How Roblox became the 'it' game for tweens—and a massive business*, CNN Business, Oct. 29,
2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>

24 22 ⁶ *Id.*

23 23 ⁷ See Roblox Corporation, Form 10-Q, March 31, 2022, available at <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-fef1fdb69aa3.pdf>, at 59.

24 24 ⁸ See Roblox Corporation, Form 10-Q, March 31, 2022, available at <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-fef1fdb69aa3.pdf>, at 15.

1 users from inappropriate behavior, such as questions about personal information and instructions
2 on how to connect on less protective third-party chat applications.”⁹

3 14. Roblox also represents that the “The algorithms in our chat filters are age-sensitive:
4 they monitor both what users can say and see based on their ages.”¹⁰

5 15. Roblox CEO and Co-Founder, David Baszucki has made public assurances that
6 safety allegedly lies at the core of everything the company has built. It was, he said, “what
7 everything rests on.”¹¹

8 16. Baszucki also has touted Roblox’s “stringent safety system,” calling it “one of the
9 most rigorous of any platform, going well beyond regulatory requirements.”¹²

10 17. Notably, however, Roblox’s director of community safety and digital civility is
11 reported as having stated that “You can’t retrofit safety,” indicating that Roblox was aware of the
12 dangers of its product and the harm it already had caused.¹³

13 18. Roblox also touts the fact that it employs hundreds of “moderators” globally to
14 actively review and address harmful and/or inappropriate content, for the specific purpose of
15 keeping its underage users safe. For example, in 2020, Roblox reported that it has “a team of 1,600
16 moderators who monitor the platform for inappropriate content and conduct safety reviews of all
17 images, audio and video files using humans and machine scanning.”¹⁴ Likewise, in November
18 2021, Roblox CEO and Co-Founder, David Baszucki, represented that Roblox employs more than
19 2,000 moderators around the world.¹⁵

17 ⁹ See Roblox Corporation, Form 10-K, for the fiscal year ended December 31, 2022, available at
18 <https://www.sec.gov/Archives/edgar/data/1315098/000131509823000035/rblx-20221231.htm>, at 59.

19 ¹⁰ Roblox Corporation 2021 Annual Report and 2022 Proxy Statement, May 26, 2022, available at
[https://s27.q4cdn.com/984876518/files/doc_financials/2021/ar/Roblox_Proxy-and-Annual-Report_Web-Ready_Bookmarked-\(1\).pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2021/ar/Roblox_Proxy-and-Annual-Report_Web-Ready_Bookmarked-(1).pdf), at 16 (pdf page 83).

20 ¹¹ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
21 available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour>

22 ¹² *Id.*

23 ¹³ *Id.*

24 ¹⁴ Shannon Liao, *How Roblox became the ‘it’ game for tweens—and a massive business*, CNN Business, Oct. 29,
25 2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>.

26 ¹⁵ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
27 available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour>.

1 19. On information and belief, Roblox knew or should have known of certain defects
2 and/or inherently dangerous features in its Roblox product, which Roblox designed, promoted,
3 operated, and distributed to the mass, public market (targeting children), and which Roblox could
4 have designed, distributed, promoted and operated safely and in a responsible manner with a
5 reasonable investment of time and capital. Roblox chose not to use safer designs and policies and
6 chose not to provide robust, accurate warnings about the dangers its product posed to child users.
7 On information and belief, Roblox made those choices, at least in part, because it believed such
8 changes might curb the explosive growth in use of the product (by number of users, amount of
9 time users spent with the product, and level of engagement with the product) and also might curb
revenues generated for Roblox by the Roblox product.

10 20. At all times relevant, while Roblox was designed for, promoted for and to, and
11 distributed to children, like Kennedy Loftin, Roblox also designed product features that provided
12 adults with unfettered and obviously dangerous access to children, such as the Roblox direct and/or
13 instant messaging (“direct messaging”) feature, as well as features that allow children to receive
14 Robux currency from complete strangers. At all times relevant, Roblox failed to take reasonable
15 steps to protect the children it targeted as its main product users and also failed to adequately warn
parents and children of the dangers of these product features.

16 21. In other words, in a product designed for, targeted at, and promoted as safe for
17 children, Roblox created and deployed product features that literally allow adult strangers to talk
18 to and connect with kids and offer them (virtual) money. And Roblox did so in the face of the
19 known risk—and known actual occurrence—of adults using the Roblox product to find and then
exploit child users—while those adult users also paid Roblox for Robux.¹⁶

20 22. Minor users lack the cognitive ability and life experience to identify online

21 ¹⁶ See, e.g., “Roblox: ‘I thought he was playing an innocent game,’ ” BBC, May 30, 2019, available at
22 <https://www.bbc.com/news/technology-48450604>; “The hidden dangers in Roblox,” KIDAS, May 26, 2021,
23 available at <https://getkidas.com/the-hidden-dangers-in-roblox/>; *The trouble with Roblox, the video game empire
built on child labour*, The Guardian, Jan. 9, 2022, available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour> (former Roblox moderator discussing grooming
and harassment that occurred to her by adults she met on Roblox as a child).

1 grooming behavior by prurient adults and the psychosocial maturity to decline invitations to
2 exchange salacious material and mass-messaging capabilities. At all times relevant, Roblox
3 allowed direct messaging with and by minors without parental notification

4 23. At all times relevant, Roblox could have taken reasonable steps (with relatively
5 nominal investment of expense and time) to better protect their child users generally and Kennedy
6 Loftin, including, for example, (a) not allowing use of its direct messaging product between minor
7 users and adult users (including employing robust age verification mechanisms and/or preventing
8 minor users from direct messaging any users without verifiable parental consent), (b) not allowing
9 adult users to initiate messaging with minors or to message with minors at all, unless such contact
10 is approved by the minor user's parent, (c) by warning parents of the direct messaging product
11 feature and of Roblox's failures to create the safe environment it promised, (d) notifying parents
12 every time their minor child engaged in direct messaging with another user (particularly an adult
13 user), and/or by providing a transcript of all direct message to parents, (e) verifying age and identity
14 (as well as parental approval) in order to block access to child users by adult users unknown to
them in real life, and (f) requiring identification and contact information, as well as an exchange
of emails, between users and minor user parents before any contact is allowed.

15 24. Direct messaging and "Robux" features are not necessary to operation of the
16 Roblox product, nor to creation of a reasonably safe, "social" platform appropriate for children.

17 **C. Additional Allegations Relating to Discord and its Discord Product**

18 25. Discord is an on-line social media product that was launched in 2015. The product
19 includes a number of features that allow users to set up accounts and communicate with other
20 product users through group and private means, including video calls, text messaging, and
exchange of photos and videos.

21 26. In theory, Discord's terms of use prohibit users under 13. However, Discord does
22 not verify user age or identity. Moreover, Discord has long been on notice that children 13 and
23

1 younger use the product—and that adults preying on children do too.¹⁷ Discord is aware, and it is
2 commonly known and understood that nobody follows that rule and that Discord allows children
3 13 and younger to use its social media product. Children as young as eight years old currently are
4 using the Discord social media product. *See Kellen Browning, 5 Ways Young People Are Using*
Discord, N.Y. Times, Dec. 29, 2021.

5 27. Discord could enforce its supposed policy of prohibiting children 13 or younger if
it wanted to. Among other things, minor users often state their real age in their bio and/or tell other
7 users their real age in group and private chats using one or more Discord product features.
8 Likewise, minor users post photos that often reflect their actual age.

9 28. Discord's product features also create an unreasonable opportunity for and risk of
sexual exploitation of kids. By default, all product users—including users under 18—can receive
10 friend invitations from anyone in the same server, which opens the ability for them to send and
11 receive private messages from strangers.¹⁸

12 29. Minor users lack the cognitive ability and life experience to identify online
grooming behavior by prurient adults and the psychosocial maturity to decline invitations to
13 exchange salacious material and mass-messaging capabilities. At all times relevant, Discord
14 allowed direct messaging with and by minors without parental notification.

15 30. Discord has designed and operates its product in such a way that it also allows
16 people to chat using fake names, and the task of enforcing community standards is largely
17 delegated to the organizers of individual Discord “servers.”¹⁹ “Server” is the term used to describe
18 a key feature of the Discord product that allow users (including, as described above, underage
19 users) to connect, exchange photo and video files, and use Discord’s audio and video
communication features.

21 ¹⁷ See, e.g., Nellie Bowles and Michael Keller, *Video Games and Online Chats Are ‘Hunting Grounds’ for Sexual*
Predators, N.Y. Times, Dec. 7, 2019, available at <https://www.nytimes.com/interactive/2019/12/07/us/video-games-child-sex-abuse.html>.

22 ¹⁸ Samantha Murphy Kelly, The dark side of Discord for teens, CNN Business, Mar. 22, 2022,
<https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

23 ¹⁹ Kellen Browning, How Discord, Born From an Obscure Game, Became a Social Hub for Young People, N.Y. Times, Dec. 29, 2021, available at <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

1 31. The Discord product generates revenue for Discord through subscription fees that
2 gives users access to features like custom emojis for \$5 or \$10 per month. Discord also began
3 experimenting in December 2021 with a new feature that allow some users to charge for access to
4 their server, up to \$100 a month, of which the company takes a 10 percent cut.²⁰

5 32. Discord is well aware that users can and do use Discord in ways that pose risks of
6 harm, abuse and exploitation, including using Discord to initiate and engage in explicit sexual
7 conduct. Discord creates false assurances that users (including minor users) can turn on feature to
8 “keep [them] safe.” On information and belief, and at all times relevant, the Discord support page
represented its “Safe Direct Messaging” feature as follows:

9 Keep me safe: The safest option. This will have Discord scan any image sent in all
10 DMs, regardless of whether you’ve added the user on your friend list, or the user is
11 DMing you just by sharing a mutual server.

12 My friends are nice: The medium-est option! This will let Discord know to scan
13 any images sent in DMs from users that aren’t on your friends list, but also to trust
14 your previously-added friends and not worry about any images they send.

15 Do not scan: The self-confident option. Enabling this option will completely disable
16 Discord’s image scanning process, and leave you for a walk on the wild side for
17 any and all DMs you receive. Careful, it’s a jungle out there!²¹

18 The representations that Discord will “scan” images and provide “Safe Messaging!” reasonably
19 would lead minor users to believe that Discord will scan for and block sexually explicit materials,
20 including materials used to groom and/or blackmail users, and otherwise “keep [the user] safe.”

21 33. As a threshold matter, Discord’s direct messaging and “Safe Direct Messaging”
22 product features are inherently defective and/or dangerous for minor users because Discord should
23 not be presenting less-safe product options (“My friends are nice” and “Do not scan”) to users
24 under 18 without their parents’ knowledge and consent.

25 34. Moreover, Discord downplays the serious dangers its product presents to minor
26 users by “jokingly” referring to unsolicited sexual overtures, grooming, displays of explicit sexual
27

28 ²⁰ Kellen Browning, How Discord, Born From an Obscure Game, Became a Social Hub for Young People, N.Y.
29 Times, Dec. 29, 2021, available at <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

30 ²¹ Discord Safety: Safe Messaging!, <https://support.discord.com/hc/en-us/articles/115000068672-Discord-Safety-Safe-Messaging->

1 materials, abuse, exploitation, and blackmail as “the wild side” and “a jungle.” Presenting these
2 less-safe options to minors and without verification of parental consent (for minor users) is a
3 product defect and/or inherently dangerous because Discord is attempting to contract with minors
4 without warning to minor parents and in a manner that poses significant risk to a significant number
5 of its minor users.

6 35. Discord’s Safe Direct Messaging product also is defective and/or does not operate
7 as promised and as reasonably understood by Discord’s minor users. This product does not operate
8 as promised and as reasonably understood by Discord’s minor (and even adult) users and creates
9 a false sense of safety that results in direct harm to a significant number of Discord’s minor users.

10 36. A reasonable person reviewing Discord’s description of its “Safe Direct
11 Messaging” feature reasonably would understand that Discord was representing it would keep
12 them “safe” from harmful interactions and predatory users, including by monitoring and saving
13 conversations had via Discord’s social media product and as long as the user selects the “Keep me
14 safe” option. Discord’s product feature does nothing of the sort, however. On information and
belief, at best, Discord scans image files for malware and similar issues. As such, users (especially
minor users) are lulled into a false and dangerous sense of security while using the product.

15 37. Discord’s product is defective as its “Safe Direct Messaging” feature does not
16 actually keep minor Discord users safe and is deceptive and misleading and inherently dangerous
17 for minor Discord users because it creates a false sense of security and encourages them to use the
Discord product under the false belief that it is safe for children.

18 38. Discord’s product also is defective and unreasonably unsafe for minor users
19 because it has no effective parental controls. Children like Kennedy Loftin are able to and do
20 routinely use Discord despite being 13 or younger and despite having no parental consent to use
the product, let alone to be placed at risk of trauma, abuse, and exploitation through use of the
21 product exactly in the manner and for the purpose for which Discord designed the product.

22 39. Discord’s product also is defective for failure to provide any effective warnings to
23 minor users, let alone their parents, of the known risk of harm from the abuse and sexual

1 exploitation when children use the product.

2 **D. Additional Allegations Relating to Meta's Oculus Product**

3 40. In June 2012, Palmer Luckey formed the company Oculus. Mr. Luckey had been
interested in virtual reality ("VR") since the age of 15 and began his company with the goal of
building a better VR headset than what currently was available to consumers.

5 41. In August 2012, Oculus raised \$2.5 million on Kickstarter and, in March 2014,
Meta acquired Oculus for \$2 billion.²² Since that purchase, Meta has made numerous VR
acquisitions and Meta founder and CEO, Mark Zuckerberg, intends for VR to become a central
part of "sports and education and health care."²³

6 9 Zuckerberg is pretty clear that Facebook's VR vision is still coming into
7 focus, even after all these years. He gives me the standard caveats
about the company not being where it needs to be, and how he knows
the headsets have to get smaller, more comfortable and easier to use.
But he also tells me VR is just the opening salvo in Facebook's longer-
term ambitions, and that it's the bridge to a future where we'll
communicate using augmented reality, which blends computer-
generated images with the real world.

10 13 He's also clear that Facebook is the company -- the *only* company --
11 that should be leading the move into a future in which we work, play
and interact inside these virtual and augmented worlds. And then he
12 takes a thinly veiled dig at rivals Apple, Google, Microsoft and maybe
even Magic Leap.

13 16 "It'll probably turn out pretty different if we're helping to shape this
14 versus any of the other companies that might work on it, who I think are
15 more inclined to push a model that's more just around 'here's your app,
here's your content, I'm gonna pull it from a store,'" he says. "We want to
16 help shape the next computing platform to be more about interacting
with people and not just apps and tasks."

17 20 <https://www.cnet.com/tech/computing/mark-zuckerberg-sees-the-future-of-ar-inside-vr-like-oculus-quest/>.

21 22 ²² According to industry insiders, Meta's quest for the metaverse began in 2014, with its purchase of Oculus. See
<https://qz.com/2086381/what-facebooks-vr-acquisitions-tell-us-about-metas-future/>.

23 24 ²³ <https://www.vox.com/2016/3/24/11587234/two-years-later-facebooks-oculus-acquisition-has-changed-virtual>.

42. At all times relevant, Meta advertised and sold its Oculus product as a gaming headset, while failing to reasonably disclose that it also could be used to access social media. In fact, Meta designed and programmed the Oculus such that a user had to connect to Meta's Facebook product to use the headset in any meaningful way. Meta did not change this Facebook account requirement until August of 2022, at which time, it began allowing users to create more general Meta accounts instead.²⁴

43. At all times relevant, users of the Oculus headset could use that product to access Meta and the other Defendants' social media products, a fact Meta did not call attention to or reasonably disclose in its product advertising or packaging.

44. Linking use of the Oculus to Meta's social media products and providing minor users with the ability to access social media platforms via the Oculus headset served no countervailing benefit to consumers and was not necessary to operation of the virtual reality games Meta advertised and offered via the Oculus headset.

DATED this 11th day of July, 2023.

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²⁴<https://mixed-news.com/en/meta-quest-2-set-up-a-meta-account-how-to-do-it/>.

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SUPPORTING ALLEGATIONS RE:
DEFENDANT META'S OCULUS PRODUCT AND
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